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Student Advisory
Memorandum No. 2000-3

September 25, 2000

M E M O R A N D U M

To: College Presidents

From: Frederick P. Schaffer *(F.P.S.)*

Re: New Legislation Regarding Student Social Security Numbers

On August 16, 2000, Governor Pataki signed a new law relating to the use of student social security numbers. The law prohibits public and private educational institutions, including colleges, from displaying any student's social security number for any public identification purpose. Although the statute prohibits the use of student social security numbers for any public identification purpose, it itemizes four common uses of social security numbers as meeting that definition: (1) the posting or public listing of grades; (2) placement on class rosters or other lists provided to teachers; (3) placement on student identification cards; and (4) use in student directories or similar listings. With the exception of class rosters which are not publicly circulated, all of the enumerated uses are already prohibited by the Family Education Rights and Privacy Act ("FERPA").

The statute does not prohibit use of a student's social security number to identify the student for internal record keeping purposes. Colleges may continue to use a student's social security number to identify the student for internal

purposes such as admissions, financial aid and other functions where the social security number is used to track students or to match the student's records with those of other schools, colleges or governmental agencies.

It is often the case that college employees will have access to a student's social security number in connection with their instructional, research, administrative or other duties or responsibilities. There is nothing in this law prohibiting those employees from seeing a student's social security number in connection with their job duties.

The new law takes effect on July 1, 2001. By that date, each college must eliminate any use of student social security numbers for any public identification purpose. We understand that, in the case of several colleges, this will necessitate removing the social security number from student identification cards that are already in circulation. In the event the college is unable to provide new cards for such students, the college could comply with the law by covering the social security number with a sticker.

We also understand that Vice Chancellor Otis Hill and University Dean Michael Ribaldo are looking into creating a system to give each student a University number, other than their social security number, to identify them for University purposes. As this is being reviewed at the University level, colleges should not attempt to create their own alternative student numbering system at this time.

If you have any questions regarding this legislation, please feel free to call this office.

c: Executive Vice Chancellor Mirrer
Vice Chancellor Hill
Vice Chancellor Hershenson
Dean Ribaldo
Chief Student Affairs Officers
Legal Affairs Designees
Registrars